

1 A I don't recall.

2 Q Okay. And I'll just -- let me ask it one more time,
3 one more -- in a different way.

4 Do you recall anything Matt told you about
5 Mr. Wright?

6 A I don't recall.

7 Q Okay. Did Matt say anything to you about seeing Mr.
8 Wright outside, appearing to Matt to be in some kind of
9 distress?

10 A I don't recall that.

11 Q When -- well, strike that.

12 After Matt presented him -- Mr. Wright to
13 you, and completed his discussion with you, what do you
14 recall happening next with respect to Mr. Wright?

15 A All I recall is what I read in his record.

16 Q Let's go to that. Let's go to page one of Exhibit 1.

17 This is a triage note authored by yourself,
18 is it not?

19 A Yes.

20 Q And I'm assuming -- when I look at these notes, I'm
21 assuming that this is you guys went -- you guys went
22 online --

23 This is computerized, isn't it?

24 A Yes.

25 Q And so when we look at these times, these times, the

1 times we see here, are they accurate? Do you know that?

2 Are these the actual input times and entry dates and all

3 that stuff? Are these all accurate?

4 A Yes, they are accurate for when it -- when I charted.

5 Q Okay. So it indicates that the date of the note --

6 I'm still on page one again of Exhibit 1. It

7 says August 2nd, 2014, at 20:50. Do you see that?

8 A Yes.

9 Q And then it says "Entry date," same date, but now
10 we're talking about 23:07. Do you see that?

11 A Yeah.

12 Q What is the significance of 20:50?

13 A When you chart, you can chart when you first started
14 your care of the patient. So that must be when I first
15 started care of the patient.

16 Q So when you do your triage, typically are you
17 inputting as you go along?

18 A When you triage a patient, typically you're inputting
19 as you go along in the triage room. If you are in a
20 patient care room, you're not.

21 Q Because in the triage room you have the --

22 A You have the computer.

23 Q Got it. Was he triaged in the patient room or in the
24 triage room?

25 A 118 is a patient room.

1 Q So, in other words, he wasn't taken from 118 to be
2 triaged somewhere else and then taken back?

3 A No.

4 Q You triaged him in 118, correct?

5 A Yes.

6 Q And can we tell from the chart here what time you
7 began to triage Mr. Wright?

8 A 20:50 from this note. That was the time I made my
9 entry at.

10 Q Okay. Why is the entry date different than the date
11 of note? I don't mean -- I don't care about the date.
12 I'm looking at the times.

13 For the date of note time you have 20:50.

14 For the entry time you have 23:07.

15 Does that mean that you entered your
16 information into the computer at 23:07, but you related
17 back that the time of first seeing the patient was 20:50?
18 Is that what this means?

19 A That's what this means.

20 Q Got it. Thank you. We go down to the "Chief
21 Complaint" on page one. Still on page one.

22 Did you draft the "Chief Complaint" or is
23 that information that came from another source?

24 MR. DERRIG: I'm going to object to the form.
25 You can go ahead and answer, though.

1 notified." Do you see that?

2 A Yes.

3 Q Who wrote that?

4 A It's a box you click.

5 Q So some of that's already in there?

6 A Yes.

7 Q Is "Outpatient to be seen immediately" a box that you
8 check or you click on?

9 A Yes.

10 Q Okay. But you were the charge nurse, correct?

11 A Yes.

12 Q So when it says "Charge nurse notified," you're just
13 informing the record that you, the charge nurse, was
14 notified of --

15 A Yes.

16 Q -- or are aware of this guy, or this patient,
17 correct? That's all that means?

18 A If someone else were to do it, yes.

19 Q When it says "Outpatient to be seen immediately,"
20 that means by a physician; is that right?

21 A Yes.

22 Q Do you know if a physician did see this patient
23 immediately or shortly after you completed this note?

24 A I don't recall specifically, the specific time frame.

25 Q If we go down about halfway down the page, it says

1 "Dr. Cashion at bedside to assess patient." Do you see
2 that?

3 A Yes.

4 Q Do we have any way in looking at these records to
5 determine when in time that happened?

6 A No.

7 Q Do you have a recollection of when in time Dr.
8 Cashion presented himself to room 118 to assess the
9 patient?

10 A I don't recall specifically.

11 Q Again, specifically, can you give us an estimate as
12 to whether it was within 10 minutes of you beginning your
13 triage? A half an hour? An hour?

14 A I really can't because his note is the same as mine.
15 So that would be fairly quick.

16 Q And we'll get to that in a second. Again, the timing
17 on these --

18 Candidly, I'm sure this is more convenient
19 for you. I like the old notes better, because they used
20 to put the times down, among other things.

21 MR. DERRIG: I need to take a break. I mean,
22 in a few minutes. But, just, we've been going about an
23 hour.

24 MR. HOWARD: We can take a break.

25 MR. DERRIG: Is that okay with everybody?